IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

JUDGE KEENAN 8 IN RE: FOSAMAX PRODUCTS LIABILITY LITIGATION (MDL No. 1789) Plaintiff Susan A. Unruh SDNY Case No. 07-CV-7294

PLAINTIFF'S MOTION TO SUBSTITUTE COUNSEL OF RECORD

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, SUSAN A. UNRUH, by and through counsel, and files this Motion to Substitute Plaintiff's Counsel of Record, and in support state as follows:

- 1. Attorneys Linda Laurent Thomas of Thomas & Wan, LLP and Joseph V. Gibson of Law Office of Joseph V. Gibson, P.C. currently represent Plaintiff Susan Unruh in this action.
- 2. Plaintiff desires that said attorneys withdraw as her counsel of record and the following attorneys be substituted as her counsel of record in this action:

SANFORD STEVENSON RIFF, LLP Shelly A. Sanford Federal Bar No. 19105 Marcus L. Stevenson Federal Bar No. 22561 Jeff L. Larson Federal Bar No. 23892 2016 Bissonnet Houston, TX 77005 713-237-1100 713-237-0278 Fax

3. The aforementioned attorneys of Sanford Stevenson Riff LLP are admitted to practice in the Southern District of New York and/or are admitted to practice Pro Hac Vice in this MDL proceeding and serve as members on the Plaintiff Steering Committee and/or its various committees.

- 4. Plaintiff Susan Unruh expressly approves of this substitution of counsel and requests the Court grant this motion.
 - 5. This substitution of counsel is not being taken for the purpose of delay.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that the Court grant her Motion to Substitute Plaintiff's Attorney of Records.

Respectfully submitted,

THOMAS & WAN L

Linda Laurent Thomas Federal Bar No. 10516 909B West Main Houston, TX 77006 713-529-1177 713-529-1116 Fax

LAW OFFICE OF JOSEPH V. GIBSON

Joseph V. Gibson Federal Bar No. 24007236 2900 Weslayan, Suite 580 Houston, TX 77027

713-333-4313 713-333-4315 Fax

ATTORNEYS FOR PLAINTIFF

SANFORD STEVENSON RIFF LLP

/s/ Shelly A. Sanford

Shelly Sanford Federal Bar No. 19105

Marcus Stevenson

Federal Bar No. 22561

Jeff L. Larson

Federal Bar No. 23892

2016 Bissonnet

Houston, TX 77005

713-237-1100

713-237-0278 Fax

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiff's Motion to Substitute Counsel filed on behalf of Plaintiff Susan Unruh was sent to all known counsel of record via the Court's electronic filing system on this 29th day of August 2007.

/s/ Shelly A. Sanford
Shelly A. Sanford